# UNITED STATE DISTRICT COURT DISTRICT OF MASSACHUSETTS

	)	
CYRANO, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 05-cv-11558-DPW
	)	
QUOTIUM TECHNOLOGIES, INC.,	)	
QUOTIUM TECHNOLOGIES, S.A., and	)	
TECHNOLOGIES, S.A.,	)	
	)	
Defendants.	)	

## **JOINT MOTION TO EXTEND STAY**

The parties to the above-captioned action hereby jointly move this Court to extend the stay in the above-captioned action previously granted on February 16, 2007, and extended on March 14, 2007, until April 11, 2007.

As grounds for this Motion, the parties state that they have agreed to a standstill of all litigation globally, pending the finalization of a written settlement agreement. The parties further state that many material terms of a settlement in this complex matter have been agreed upon and that they are working diligently to finalize the remaining terms and have made progress in doing so. Because the French component of the settlement must be done in French, and there is translation to be done in both directions, the process has taken longer than expected. The parties respectfully submit that, in view of their belief that they are very close to reach agreement on all material settlement terms, a continuation of the stay of this action will serve the interests of justice and judicial economy.

WHEREFORE, the parties respectfully request that the court continue the stay of this mater, and the parties shall, within 30 days of the Court's Order continuing this stay, advise the Court as to their progress and intentions regarding the furtherance of the stay.

Respectfully submitted,

Plaintiff, CYRANO, INC., By its attorneys,

### /s/ Michael K. Sugrue

Stephen Y. Chow, BBO #082990 Michael K. Sugrue, BBO #655878 **BURNS & LEVINSON LLP** 125 Summer Street Boston, MA 02110 617-345-3000 Dated: April 11, 2007

Defendants,

QUOTIUM TECHNOLOGIES, INC., **QUOTIUM TECHNOLOGIES, S.A., and TECHNOLOGIES, S.A.** 

By their attorneys,

#### /s/ Kevin J. O'Connor

Kevin J. O'Connor, BBO #555250 Mayeti Gametchu, BBO #647787 PARAGON LAW GROUP, LLP 184 High Street Boston, MA 02110 (617) 399-7950

Dated: April 11, 2007

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2007, the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Michael K. Sugrue\_